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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File Case No. 3:07-cv-05944-SC

MDL No. 1917

Individual Case No. 3:11-cv-06397-SC

**DECLARATION OF DAVID J. BURMAN IN
SUPPORT OF COSTCO WHOLESALE
CORPORATION'S ADMINISTRATIVE
MOTION TO FILE DOCUMENTS UNDER
SEAL PURSUANT TO CIVIL LOCAL RULES
7-11 AND 79-5(d)**

This Document Relates To:

The Honorable Samuel Conti

*Costco Wholesale Corporation v. Hitachi,
Ltd., et al., No. 3:11-cv-06397-SC*

1 I, DAVID J. BURMAN, do testify as follows:

2 1. I am an attorney at the law firm Perkins Coie LLP, counsel of record for Plaintiff
3 Costco Wholesale Corporation (“Costco”) in this action. This declaration is submitted in support
4 of Costco’s Administrative Motion to File Documents Under Seal Pursuant to Civil Local Rules
5 7-11 and 79-5(d) (the “Motion to Seal”).

6 2. On June 18, 2008, the Court approved a Stipulated Protective Order (Dkt. No. 306)
7 (“Protective Order”) in this matter.

8 3. Defendants and other parties to this litigation have produced in this action certain
9 documents and information designated as either “Confidential” or “Highly Confidential” pursuant
10 to the Stipulated Protective Order.

11 4. On December 23, 2014, in conjunction with the filing of this declaration, Plaintiffs
12 will file the Motion to Seal, seeking an order to seal the following documents, pursuant to Civil
13 Local Rules 7-11 and 79-5(d):

- 14 • Costco Wholesale Corporation’s Opposition to Defendants’ Joint Motion for
15 Partial Summary Judgment on Due Process Grounds and Defendants’ Joint Motion
16 for Partial Summary Judgment on Choice of Law Grounds; and
- 17 • Exhibits 1-32 to the Declaration of David J. Burman in Support of Costco
18 Wholesale Corporation’s Opposition to Defendants’ Joint Motion for Partial
19 Summary Judgment on Due Process Grounds and Defendants’ Joint Motion for
20 Partial Summary Judgment on Choice of Law Grounds.

21 5. Pursuant to Civil Local Rules 7-11 and 79-5(d), this Court’s General Order No. 62,
22 Electronic Filing of Documents Under Seal, effective May 10, 2010, and the Protective Order, the
23 designated portions of the above-referenced documents and redacted portions thereof contain
24 either: (1) material designated by a Defendant pursuant to a Protective Order as “Confidential” or
25 “Highly Confidential”; or (b) analysis or, references to, or information taken directly from
26 material designated by a Defendant pursuant to a Protective Order as “Confidential” or “Highly
27 Confidential.”
28

6. Costco filed the above-referenced documents in good faith under seal pursuant to Civil Local Rules 7-11 and 79-5(d), this Court's General Order No. 62, Electronic Filing of Documents Under Seal, effective May 10, 2010, and the Protective Order.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 22nd day of December, 2014, at Seattle, Washington.

David J. Burman